

**REQUIRED STATEMENT
TO ACCOMPANY ALL MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Amanda Lee Case No. 20-01588 Chapter 13
All Cases: Name of Moving Creditor Ford Motor Credit Company LLC Date Case Filed 1-20-2020

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed 4-29-2020

Chapter 7: ☐ No-Asset Report Filed on _____
☐ No-Asset Report not Filed, Date of Creditors Meeting _____

1. Collateral
a. ☐ Home _____
b. ☒ Car Year, Make and Model 2014 Ford Fusion
c. ☐ Other _____

2. Balance Owed as of Petition Date \$ 15,432.30
Total of all other Liens against Collateral \$ _____

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.: _____

4. Estimated Value of Collateral (must be supplied in all cases) \$11,675

5. Default
a. ☐ Pre-Petition Default
Number of months _____ Amount \$ _____
b. ☐ Post-Petition Default
☐ On direct payments to the moving creditor
Number of months _____ Amount \$ _____
☐ On payments to the Standing Chapter 13 Trustee
Number of months > 2 Amount \$ 1,000

6. Other Allegations
a. ☒ Lack of Adequate Protection § 362 (d)(1)
i. ☐ No insurance _____
ii. ☐ Taxes unpaid _____ Amount \$ _____
iii. ☒ Rapidly depreciating asset _____
iv. ☒ Other (describe) The default above is before adding attorneys fees & costs.
b. ☒ No Equity and not Necessary for an Effective Reorganization § 362 (d)(2)
c. Other "Cause" § 362 (d)(1)
i. ☐ Bad Faith _____
ii. ☐ Multiple filings _____
iii. ☒ Other (describe) Debtor last paid the trustee in October of 2020.
d. Debtor's Statement of Intention regarding the Collateral
i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☐ No Statement of Intention Filed

Date: January 8, 2021
(Rev. 6/1/09)

/s/ Christopher H. Purcell
Counsel for Movant